

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE

RAJU A.T. DAHLSTROM,

Plaintiff,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

Case No. 2:16-cv-01874-RSL

STIPULATED MOTION TO
EXTEND INITIAL SCHEDULING
DATES AND ~~PROPOSED~~
ORDER

NOTING DATE: JUNE 20, 2017

**[CLERK'S ACTION
REQUIRED]**

JOINT STIPULATION

COMES NOW plaintiff, Raju Dahlstrom, by and through his attorney, Richard L. Pope, defendant, United States of America, through its counsel, Tricia Boerger, Assistant United States Attorney, and the individual defendants, by and through their attorney, Jack W. Fiander, in this stipulated motion to extend the initial scheduling dates in this matter as follows:

Deadline for FRCP 26(f) Conference: 07/27/2017

Initial Disclosures Pursuant to FRCP 26(a)(1): 08/17/2017

Combined Joint Status Report and Discovery
Plan as Required by FRCP 26(f) and Local
Civil Rule 26(f): 08/28/2017

STIPULATED MOTION TO
EXTEND INITIAL SCHEDULING DATES
AND ~~PROPOSED~~ ORDER
[Case No. 2:16-cv-01874-RSL] - 1

UNITED STATES ATTORNEY
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
206-553-7970

1 This extension is necessary because the United States has not yet filed an answer
2 and is still working with federal agencies to review the ten claims in this matter and
3 respond to Plaintiff's assertions that the fifteen individual defendants were employees
4 acting within their scope of employment on behalf of the United States. As such, the
5 United States, and the individual defendants, are not in a position to meaningfully
6 participate in a discovery conference, submit initial disclosures or prepare a discovery
7 plan. The United States' responsive pleadings are due on July 17, 2017. As such, the
8 parties are requesting an extension of time for the initial scheduling dates to allow them
9 time to review the initial pleadings and participate meaningfully in the FRCP 26 process.

9 **SO STIPULATED**

10 Dated this 20th day of June, 2017.

11 Respectfully submitted,
12 ANNETTE L. HAYES
United States Attorney

13 s/Tricia Boerger
14 TRICIA BOERGER, WSBA #38581
15 Assistant United States Attorney
16 Western District of Washington
United States Attorney's Office
17 700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
18 Phone: 206-553-7970
Email: tricia.boerger@usdoj.gov

19 *Attorney for Defendant United States of America*
20
21
22
23
24

1 **SO STIPULATED**

2 Dated this 20th day of June, 2017.

3 s/ Richard L. Pope
4 RICHARD L. POPE, WSBA No. 21118
5 Lake Hills Legal Services, P.C.
6 15600 N.E. 8th Street, Suite B1-358
7 Bellevue, Washington 98008
8 Phone: 425-829-5305
9 Email: rp98007@gmail.com

10 *Attorney for Plaintiff*

11 **SO STIPULATED**

12 Dated this 20th day of June, 2017.

13 s/ Jack W. Fiander
14 JACK W. FIANDER, WSBA No. 13116
15 TOWTNUK LAW OFFICES LTD
16 Sacred Ground Legal Services Inc
17 5808a Summitview Avenue, Ste. 97
18 Yakima, WA 98908
19 Phone: 509-961-0096
20 Email: towtnuklaw@msn.com

21 *Attorney for Individual Defendants*

ORDER

The Court, having reviewed the parties' stipulated motion and the record in this matter and being fully informed, finds good cause exists to extend the initial scheduling dates as requested. Counsel for the United States has not yet filed an answer or had sufficient time to review the case, such that neither party would be in a position to meaningfully participate in the FRCP 26 process. As such, and the parties having so stipulated and agreed, it is hereby ORDERED that the initial scheduling dates are extended as follows:

Deadline for FRCP 26(f) Conference: 07/27/2017

Initial Disclosures Pursuant to FRCP 26(a)(1): 08/17/2017

Combined Joint Status Report and Discovery
Plan as Required by FRCP 26(f) and Local
Civil Rule 26(f): 08/28/2017

DATED this 27th day of June, 2017.



HONORABLE ROBERT S. LASNIK
United States District Court Judge